

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO. 1:23-cv-480

PLANNED PARENTHOOD SOUTH)
ATLANTIC; BEVERLY GRAY, M.D, on)
behalf of themselves and their patients seeking)
abortions,)

Plaintiffs,)

v.)

JOSHUA H. STEIN, Attorney General of North)
Carolina; in his official capacity; TODD M.)
WILLIAMS, District Attorney (“DA”) for)
Prosecutorial District (“PD”) 40, in this official)
capacity; JIM O’NEILL, DA for PD 31, in this)
official capacity; SPENCER B.)
MERRIWEATHER III, DA for PD 26, in his)
official capacity; AVERY CRUMP, DA for PD)
24, in her official capacity; JEFF NIEMAN,)
DA for PD 18, in his official capacity; SATANA)
DEBERRY, DA for PD 16, in her official)
capacity; WILLIAM WEST, DA for PD 14, in)
his official capacity; LORRIN FREEMAN, DA)
for PD 10, in her official capacity; BENJAMIN)
R. DAVID, DA for PD6, in his official capacity;)
KODY H. KINSLEY, M.P.P., Secretary of the)
North Carolina Department of Health and)
Human Services, in this official capacity;)
MICHAUX R. KILPATRICK, M.D., PhD.,)
President of the North Carolina Medical Board,)
in her official capacity, on behalf of herself, the)
board and its Members; RACQUEL INGRAM,)
PhD., R.N., Chair of the North Carolina Board)
of Nursing, in her official capacity, on behalf of)
herself, the Board and its members; and their)
employees, agents, and successors,)

Defendants.)

**STATE LICENSING BOARD
DEFENDANTS’ RESPONSE TO
PLAINTIFFS’ AMENDED
MOTION FOR A
PRELIMINARY INJUNCTION**

Defendant Michaux R. Kilpatrick, M.D., in her official capacity as President of the North Carolina Medical Board, and Defendant Racquel Ingram, PhD., R.N., Chair of the North Carolina Board of Nursing, in her official capacity (collectively, “the Licensing Board Defendants”), by and through undersigned counsel, hereby respond to Plaintiffs’ Amended Motion For A Preliminary Injunction [D.E. 48]. The Licensing Board Defendants take no position on Plaintiffs’ Motion.

Respectfully submitted, this 31st day of July 2023.

JOSHUA H. STEIN
Attorney General

/s/ Michael Bulleri
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